REMARKS

I.   INTRODUCTION

Claims 1 and 6-11 have been amended. Thus, claims 1 and 4-15 remain pending in the present application. No new matter has been added. In light of the above amendments and the following remarks, Applicant respectfully submits that all presently pending claims are in condition for allowance.

II.   THE 35 U.S.C. § 112 REJECTIONS SHOULD BE WITHDRAWN

Claims 6-10 stand rejected under 35 U.S.C. §112, first paragraph, for failing to comply with the written description requirement. Specifically, the Examiner states that "a computer readable storage medium," as recited in claim 6-10, are not "positively supported in the specification." (See 4/13/09 Office Action, p. 6). Initially, it is noted that the original claims supported a computer program product. Furthermore, the specification explicitly states that claimed invention deals with "speech received from a user in a form that can be machine processed." (See Specification, ¶ [0003]). Thus, claims 6-10 have been amended to recite "a processor executing a computer program product." Accordingly, the withdrawal of this rejection is respectfully requested.

Claim 4 stands rejected under 35 U.S.C. §112, second paragraph, for being indefinite. In light of the above amendments, Applicant respectfully requests the withdrawal of this rejection.

III.   THE 35 U.S.C. § 101 REJECTION SHOULD BE WITHDRAWN

Claims 1, 4, and 5 stand rejected under 35 U.S.C. §101 for failing to fall within one of the four statutory categories of invention. (See 4/13/09 Office Action, p. 7). Independent claim 1 has been amended to recite "[a] method carried out by a processor." Thus, claim 1 is clearly "tied to a particular machine or apparatus" (a processor) and is allowable. The recitation of a processor is supported in the specification as described above. Because claims 4 and 5 depend on and, therefore, contain all of the limitations of claim 1, it is respectfully submitted that these claims are also allowable.

IV.   THE 35 U.S.C. § 103(a) REJECTION SHOULD BE WITHDRAWN

Claims 1 and 4-15 stand rejected under 35 U.S.C. §103(a) for being obvious over Brill et al. (U.S. Published App. No. 2002/0169596) in view of Schabes et al. (U.S. Patent No. 5,537,317).

Claim 1 recites "calculating a probability that the phrase is mapped to a semantic tag from a list of unordered semantic tags, wherein the probability is calculated by means of a statistical procedure."

The Examiner correctly acknowledges that Brill fails to disclose or suggest "calculating a probability from a list of unordered semantic tags." (See 4/13/09 Office Action, p. 9, ll. 1-2). In order to cure this deficiency, the Examiner relies on Schabes. Initially, it is noted that it is not evident from the Examiner's two-page explanation of Schabes how Schabes discloses a list of unordered semantic tags. After initial examination of this explanation, it seems the Examiner fails to address this point. All the same, Applicants disagree with the Examiner's assertion that Schabes discloses a list of unordered semantic tags. The system of Schabes uses a module (26) to select a correct sentence for an input sentence (S1). The inputs to the module are "the probabilities of the various sentences as well as the input sentence. This module is provided with a list of easily confused words." (See Schabes, col. 3, ll. 50-54). Schabes discloses that the "words in the sentence S1 may be part of a list of easily confused words, in which case, all possible alternative sentences S2 to the sentence S1 are generated according to list 36." (See Id., col. 9, ll. 7-10). This list "typically includes the following sets: to, too, two; I, me; its, it's; their, they're, there; whose, which; then, than; whose, who's; our, are; hear, here; past, passed; accept, except; advice, advise; lose, loose; write, right; your, you're; affect, effect and maybe, may be." (See Id., col. 10, ll. 1-6). It is evident that list 36 does, in fact, have some order to it. Each set in this list is a group of words that either have similar meanings or are homonyms. Another list provided by Schabes is a list of English exceptions. (See Id., Tables 1, 2). These lists are in alphabetical order. First, the capitalized words are listed alphabetically. Then the non-capitalized words are listed alphabetically. Schabes further explains that "an English words corrector 600 includes an English words dictionary 602." (See Id., col. 18, ll. 45-46). As is well known in the art, the words in dictionaries are in alphabetical order. Accordingly, it is respectfully submitted

that Schabes fails to disclose or suggest "*a list of unordered semantic tags*," as recited in claim 1. Thus, Applicant respectfully submits that claim 1 and its dependent claims 4 and 5 are allowable.

Independent claim 6 recites, "calculating a mapping probability that a semantic tag of a set of unordered candidate semantic tags is assigned to a phrase, wherein the calculation of the mapping probability is performed by means of a statistical procedure based on a set of phrases constituting a corpus of sentences, each of the phrases having assigned a set of candidate semantic tags." Applicant submits that this claim is also allowable for at least the same reasons stated above with respect to claim 1. Because claims 7-10 depend from, and therefore include all the limitations of claim 6, it is respectfully submitted that these claims are also allowable for at least the same reasons given above with respect to claim 6.

Independent claim 11 recites, "a processor for calculating a mapping probability that a semantic tag of a set of unordered candidate semantic tags is assigned to a phrase, wherein the calculation of the mapping probability is performed by means of a statistical procedure based on a set of phrases constituting a corpus of sentences, each of the phrases having assigned a set of unordered candidate semantic tags." Because claims 12-15 depend from, and therefore include all the limitations of claim 11, it is respectfully submitted that these claims are also allowable for at least the same reasons given above with respect to claim 11.

CONCLUSION

In light of the foregoing, Applicant respectfully submits that all of the presently pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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